## IN THE UNITED STATES BANKRUPTCY COURT FOR THE DISTRICT OF DELAWARE

|                           |          | Re: D.I. 2582          |
|---------------------------|----------|------------------------|
|                           | Debtors. | (Jointly Administered) |
| BIG LOTS, INC., et al., 1 |          | Case No. 24-11967 (JKS |
| In re:                    |          | Chapter 11             |

CERTIFICATE OF NO OBJECTION REGARDING MOTION OF DEBTORS PURSUANT TO 11 U.S.C. § 105 AND FED. R. BANKR. P. 9019 AUTHORIZING AND APPROVING THE DEBTORS' ENTRY INTO A SETTLEMENT AGREEMENT BETWEEN THE DEBTORS AND THEIR PROPERTY INSURERS

The undersigned hereby certifies that, as of the date hereof, the above-captioned debtors and debtors in possession (the "**Debtors**") have received no answer, objection or other responsive pleading to the *Motion of Debtors Pursuant To 11 U.S.C. § 105 and Fed. R. Bankr. P. 9019 Authorizing and Approving the Debtors' Entry into a Settlement Agreement Between the Debtors and their Property Insurers (D.I. 2582) (the "Motion"), filed on April 21, 2025.* 

The undersigned counsel further certifies that no answer, objection or other responsive pleading to the Motion appears on the Court's docket in these cases. Pursuant to the Motion, objections were to be filed and served no later than May 5, 2025, at 4:00 p.m. (ET).

WHEREFORE, the Debtors respectfully request that the Court enter the proposed order attached to the Motion at its earliest convenience.

The debtors and debtors in possession in these chapter 11 cases, along with the last four digits of their respective employer identification numbers, are as follows: Great Basin, LLC (6158); Big Lots, Inc. (9097); Big Lots Management, LLC (7948); Consolidated Property Holdings, LLC (0984); Broyhill LLC (7868); Big Lots Stores - PNS, LLC (5262); Big Lots Stores, LLC (6811); BLBO Tenant, LLC (0552); Big Lots Stores - CSR, LLC (6182); CSC Distribution LLC (8785); Closeout Distribution, LLC (0309); Durant DC, LLC (2033); AVDC, LLC (3400); GAFDC LLC (8673); PAFDC LLC (2377); WAFDC, LLC (6163); INFDC, LLC (2820); Big Lots eCommerce LLC (9612); and Big Lots F&S, LLC (3277). The address of the debtors' corporate headquarters is 4900 E. DublinGranville Road, Columbus, OH 43081.

Dated: May 7, 2025 Wilmington, Delaware

## MORRIS, NICHOLS, ARSHT & TUNNELL LLP

/s/ Sophie Rogers Churchill

Robert J. Dehney, Sr. (No. 3578)

Andrew R. Remming (No. 5120)

Daniel B. Butz (No. 4227)

Sophie Rogers Churchill (No. 6905)

Brianna N. V. Turner (No. 7468)

1201 N. Market Street, 16th Floor

P.O. Box 1347

Wilmington, DE 19899-1347

Telephone: (302) 658-9200

Facsimile: (302) 658-3989

rdehney@morrisnichols.com

aremming@morrisnichols.com

dbutz@morrisnichols.com

srchurchill@morrisnichols.com

bturner@morrisnichols.com

-and-

## DAVIS POLK & WARDWELL LLP

Brian M. Resnick (admitted *pro hac vice*)

Adam L. Shpeen (admitted pro hac vice)

Stephen D. Piraino (admitted *pro hac vice*)

Kevin L. Winiarski (admitted *pro hac vice*)

450 Lexington Avenue

New York, NY 10017

Tel.: (212) 450-4000

brian.resnick@davispolk.com

adam.shpeen@davispolk.com

stephen.piraino@davispolk.com

kevin.winiarski@davispolk.com

Counsel to the Debtors and Debtors in Possession